

**ASSISTANT SECRETARY OF DEFENSE  
6000 DEFENSE PENTAGON  
WASHINGTON, DC 20301-6000**

July 21, 2000

MEMORANDUM FOR SECRETARIES OF THE MILITARY DEPARTMENTS  
CHAIRMAN OF THE JOINT CHIEFS OF STAFF  
UNDER SECRETARIES OF DEFENSE  
DIRECTOR, DEFENSE RESEARCH AND ENGINEERING  
ASSISTANT SECRETARIES OF DEFENSE  
GENERAL COUNSEL OF THE DEPARTMENT OF DEFENSE  
INSPECTOR GENERAL OF THE DEPARTMENT OF DEFENSE  
DIRECTOR, OPERATIONAL TEST AND EVALUATION  
ASSISTANTS TO THE SECRETARY OF DEFENSE  
DIRECTOR, ADMINISTRATION AND MANAGEMENT  
DIRECTORS OF THE DEFENSE AGENCIES  
DIRECTORS OF THE DOD FIELD ACTIVITIES

**SUBJECT: Accessibility of DoD Web Sites to People with Disabilities**

In 1998, Congress amended the Rehabilitation Act and strengthened provisions covering access to Federal information by people with disabilities. As amended, this act requires Federal agencies to ensure that any electronic and information technology developed, used, procured or maintained by the agency is accessible to people with disabilities, both employees and the public, to the extent that it does not pose an undue burden. The guidelines for demonstrating "undue burden" have not yet been clarified, but are expected to be consistent with other requirements if the Americans with Disabilities Act (ADA) where the term has been defined as "significant difficulty or expense."

The amendment (section 508, attached) also provided for development of access standards, to become part of the Federal Acquisition Regulations, to help agencies determine whether a product or system is accessible, and for enforcement via an administrative complaint process or lawsuit. The Access I3board, an independent Federal agency charged with development of the standards, has published proposed standards, but final standards are not yet available. Nonetheless, since web sites are rapidly becoming a primary access tool for both the public and government employees, GSA, in a memo sent to all Federal Chief Information Officers, asked Federal agencies to begin work on their web pages. A target date of July 26, 2000, the 10th anniversary of the ADA, was set for having accessible the agencies' principal web sites and the top 20 sites by volume of use.

As DOD currently has tens of thousands of web pages, with more being added daily, accessibility is a significant requirement that will need to be addressed over time. However, the Department must show an immediate and continuing

"good faith" effort to comply with section 508 and this initial request. Therefore, addressees should take immediate action to ensure that their organization's principal web site is brought into compliance with these requirements, as requested, and that all remaining pages are addressed subsequently.

The GSA Center for Information Technology Accommodation (CITA) has provided the attached web guidelines as an indication of those that may be expected in the final standards as well as a list of some available resources that may assist with this process. The GSA is also offering free technical training for webmasters, to be held in the Washington, DC area and broadcast via satellite. Details and registration are available through the CITA web site (<http://www.itpolicy.gsa.gov/cita/>).

To support and document your efforts, web site owners/sponsors should review their existing web pages against the attached web accessibility guidelines and take necessary steps to achieve compliance. Due to the public interest in this initiative, it is recommended that a plan for remediation and compliance testing be developed and executed. This plan should address, at a minimum:

- priorities for addressing the pages (e.g., home page, pages with high volume of usage, new pages, updated pages, old pages),
- schedule,
- resources (e.g., funding, personnel, tools/software, training) required, and
- impact of technology available, including any planned new/upgraded technology.

Other factors (e.g., security) should be addressed as appropriate.

National security systems are exempt from these requirements; however, this exemption shall not be applied to any publicly accessible DOD web site/page. Additionally, non-public web sites supporting exempt systems should comply whenever possible, in keeping with the law's intent of making information more accessible to Department personnel with disabilities.

Several of the proposed requirements listed in the CITA document are relatively simple and inexpensive to implement (e.g., provide text equivalent for each non-text element, make meaning independent of color used). Thus, to the greatest extent practical pending issuance of the final standards, the proposed requirements should be immediately incorporated into each site's guide for web page development. Local web site administration procedures should also be updated to establish/include checks to ensure accessibility of new and updated pages prior to posting.

Questions on application of this guidance to DoD web sites should be directed to Ms. Linda Brown, OASD(C31), 703-695-2289, [Linda.Brown@osd.mil](mailto:Linda.Brown@osd.mil). Other questions regarding section 508 should be directed to Mr. David Roach, OASD (C31), Interim DOD Information Technology (IT) Accessibility Coordinator, (703) 602-0980 x163, [David.Roach@osd.mil](mailto:David.Roach@osd.mil), or Ms. Judith Gilliom, OASD(FMP), DOD Disability Program Manager, 703-697-8661, [gilliomj@pr.osd.mil](mailto:gilliomj@pr.osd.mil).

/signed for/  
Arthur L. Money  
DoD Chief Information Officer

**Attachments:**

1. Workforce Investment Act of 1998, Sec. 508. Electronic and Information Technology.
2. Section 508 (NPRM) Web Accessibility Standards, 1194.23 Component specific requirements, (c) Web-based information or applications.
3. A Short List of References for Accessible Web Site Design

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